

Debtor 1 Ricardo Montoya

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: NORTHERN District of TEXAS
(State)

Case number 16-30820

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank Trust N.A., as Trustee of the Igloo Series III Trust Court claim no. (if known): 3

Last 4 digits of any number you use to identify the debtor's account: 4 1 8 6

Property address: 4543 Bowie Lane
Number Street

Grand Prairie TX 75052
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 05/01 2020
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 **Ricardo Montoya** Case number (if known) **16-30820**

First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Raymond Valderrama

Signature

Date **04 22 2020**

____/____/____

Print **Raymond Valderrama**

First Name Middle Name Last Name

Title **AVP Bankruptcy**

Company **BSI Financial Services**

If different from the notice address listed on the proof of claim to which this response applies:

Address **7505 Irvine Center Drive**

Number Street

Irvine CA 92618

City State ZIP Code

Contact phone **949 201 4287**

(____) ____-____

Email _____

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Response to Notice of Final Cure was served on April 24, 2020. The Response was filed electronically. Service was accomplished by the method and to the following as indicated.

By: /s/ Richard Anderson
RICHARD E. ANDERSON
State Bar No. 01209010
4920 Westport Drive
The Colony, Texas 75056
Email: randerson@AndersonVela.com

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

DEBTOR
Ricardo Montoya
4543 Bowie Lane
Grand Prairie, TX 75052

CO-DEBTOR
Maria S. Montoya (Pro-forma)
4543 Bowie Lane
Grand Prairie, TX 75052

DEBTORS' ATTORNEY
Truman E. Coe, Jr.
2720 N. Stemmons Frwy.
Suite 1202, South Tower
Dallas, TX 75207

TRUSTEE
Thomas Powers
105 Decker Court, Ste 1150
Irving, TX 75062

U.S. TRUSTEE
United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242

CREDITOR ATTORNEY

Abbey U. Dreher
Barrett Daffin Frappier Turner
& Engel
4004 Beltline Road, Suite 100
Addison, TX 75001-4320
972-341-0904
972-341-0502 (fax)
ndecf@BDFGROUP.com
Assigned: 06/20/2016

representing Wells Fargo Bank, N.A.
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(*Creditor*)

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(858) 412-2683 (fax)
ecftxb@aldridgepite.com
Assigned: 04/07/2017

representing PROF-2013-S3 Legal Title Trust IV, By U.S.
Bank National Association, As Legal Title
Trustee C/O Fay Servicing, LLC
(*Creditor*)

Sherrel K. Knighton
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2777 N. Stemmons Frwy Ste
1000
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Assigned: 03/28/2016

representing Dallas County
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Assigned: 05/10/2016

representing CONN APPLIANCES, INC . AS ATTORNEY-
IN-FACT AND SERVICER-IN-FACT FOR
CONN CREDIT I, LP and-or CONNS
RECEIVABLES FUNDING I, LP
P.O. BOX 2358
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(*Creditor*)

/s/ Richard Anderson
RICHARD E. ANDERSON